



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

VIA ELECTRONIC AND CERTIFIED MAIL

Paul E. Sullivan
Sullivan & Associates, PLLC
601 Pennsylvania Ave., NW
Suite 900
Washington, DC 20004

DEC 12 2013

RE: MUR 6413
Taxpayer Network

Dear Mr. Sullivan:

On July 1, 2013, the Office of the General Counsel ("OGC") mailed you a brief ("General Counsel's Brief") setting forth the factual and legal basis upon which OGC was prepared to recommend that the Commission find probable cause to believe that your client, Taxpayer Network, violated 2 U.S.C. §§ 434(f) and 441d. On August 19, 2013, you confirmed that your client did not intend to submit a reply brief and instead wished to settle the matter.

Pursuant to the Agency Procedure Following the Submission of Probable Cause Briefs by the Office of General Counsel, 76 Fed. Reg. 63,570 (Oct. 13, 2011), OGC is notifying the Commission that it intends to proceed with the recommendation to find probable cause to believe that Respondent violated 2 U.S.C. §§ 434(f) and 441d based on the factual and legal analysis set forth in the General Counsel's Brief. A copy of this Notice is being provided to you contemporaneously.

Should you have any questions, please contact me at 202-694-1574.

Sincerely,


Margaret R. Howell
Attorney

Enclosure
OGC Notice to the Commission

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FEDERAL ELECTION COMMISSION
Washington, DC 20463

MEMORANDUM

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4 TO: The Commission
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6 FROM: Lisa J. Stevenson
7 Deputy General Counsel for Law
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9 Daniel A. Petalas *DAF*
10 Associate General Counsel
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12 Kathleen Guith *KG*
13 Deputy Associate General Counsel
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15 Mark Shonkwiler *MS*
16 Assistant General Counsel
17
18 Margaret R. Howell *MRH*
19 Attorney
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21 SUBJECT: MUR 6413 (Taxpayer Network)
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23 RE: Office of the General Counsel's Notice to the Commission Following the
24 Submission of Probable Cause Brief

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26 On July 1, 2013, the Office of the General Counsel ("OGC") mailed Taxpayer Network a
27 brief ("General Counsel's Brief") setting forth the factual and legal basis upon which OGC was
28 prepared to recommend that the Commission find probable cause to believe that Respondent
29 violated 2 U.S.C. §§ 434(f) and 441d.¹ A copy of that brief was provided to the Commission on
30 July 2, 2013. Respondent did not submit a reply brief within the statutory fifteen day period.
31 See 2 U.S.C. § 437g(a)(3). Respondent has since indicated that it did not intend to submit a reply
32 brief and wishes to settle the matter. Letter from Paul Sullivan, Counsel, Taxpayer Network, to
33 Margaret Howell, Att'y, FEC (Aug. 19, 2013).
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¹ The return receipt indicates that Respondent received the General Counsel's Brief on July 15, 2013.

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1 Pursuant to the Agency Procedure Following the Submission of Probable Cause Briefs by
2 the Office of General Counsel, 76 Fed. Reg. 63,570 (Oct. 13, 2011), OGC is hereby notifying the
3 Commission that it intends to proceed with the recommendation to find probable cause to believe
4 that Respondent violated 2 U.S.C. §§ 434(f) and 441d based on the factual and legal analysis set
5 forth in the General Counsel's Brief. A copy of this Notice is being provided to the Respondent
6 contemporaneously.

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8 **RECOMMENDATION**
9

10 Find probable cause to believe that Taxpayer Network violated 2 U.S.C. §§ 434(f)
11 and 441d.

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